Remarks

In response to the Office Action dated April 09, 2007, Applicants respectfully request reconsideration based on the following remarks. Applicants respectfully submit that the claims as presented are in condition for allowance. In the Office Action, claims 1-4, 7-12, 14, and 16-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Pearson in view of Giangarra et al, and further in view of Ballard

Claim Rejections - 35 U.S.C. §103

In the Office Action, claims 1-3, 7, 9-12, 16-18 and 20 are rejected as being unpatentable over Pearson (US 6,023,684) in view of Giangarra (US 6,101,472) and further in view of Ballard (US 7,111,243). The rejection of the claims is respectfully traversed.

Independent claim 1 specifies a system for permitting a user to remotely access data. The system includes a systems interface to a plurality of legacy systems, the systems interface comprising a first server for managing protocol and a second server for generating legacy transactions, and a firewall that protects the first server and the second server, wherein the protocol server provides multiple operations that may be utilized for generating the legacy transactions; a computer operable by the user to access data from the legacy systems through the systems interface, wherein the computer is programmed with a client application for accessing the systems interface, wherein the client application provides a graphical user interface that has a page for selecting one of the multiple operations provided by the protocol server for the client application, and has a page comprising a plurality of data fields for each of the multiple operations wherein when an operation is selected the corresponding page is displayed, and wherein the client application is adapted to format requests for information based on user input within one of the pages corresponding to one of the multiple operations; a voice input device coupled to the computer; wherein the computer is further programmed with a speech recognition application for receiving voice input from a user, wherein the speech recognition application is adapted to convert the voice input into data recognized by the client application, wherein the speech recognition application has a voice module that accesses a stored separate vocabulary for each of the pages for selecting and performing

the multiple operations utilized for generating the legacy transactions on the legacy systems, wherein selecting the multiple operations comprises utilizing the voice input for navigating to a search page and selecting an operation for retrieving client account information, and wherein performing the multiple operations comprises inputting the client account information to complete at least one of the plurality of data fields, wherein inputting the client account information to complete at least one of the plurality of data fields comprises utilizing the voice input to navigate among the plurality of data fields.

It is respectfully submitted that the combination of Pearson, Giangarra and Ballard fails to describe each of the features specified in independent claim 1. For example, the aforementioned references fail to describe selecting the multiple operations comprises *utilizing the voice input for navigating to a search page* and selecting an operation for retrieving client account information…wherein *inputting the client account information to complete at least one of the plurality of data fields comprises utilizing the voice input to navigate among the plurality of data fields*.

The Office Action asserts that of Pearson describes most of the claim elements but concedes that the Pearson fails to describe *utilizing the voice input for navigating to a search page* and …wherein *inputting the client account information to complete at least one of the plurality of data fields comprises utilizing the voice input to navigate among the plurality of data fields*.

Giangarra discusses that the vocabulary for a web page is created upon the user accessing the web page such that the vocabulary is created by parsing the mark-up document of the web page to find all of the links and then creating the vocabulary based on those links (Col. 2, lines 18-57). Gingarra, however, also fails to describe *utilizing the voice input for navigating to a search page* and …wherein *inputting the client account information to complete at least one of the plurality of data fields comprises utilizing the voice input to navigate among the plurality of data fields*.

The Office Action proceeds by asserting that Ballard cures the deficiencies of the combination of Pearson and Giangarra. The Office Action relies on Ballard to describe the elements of utilizing voice input for navigating to a search page and …wherein inputting the client account information to complete at least one of the plurality of data fields comprises utilizing the voice input to navigate among the plurality of data fields.

However, Applicants respectfully point out that the filing date of Ballard (December 2001) post dates the filing date of the instant application (June 2001). As such, Applicants respectfully assert that Ballard, per se, is not prior art as to the instant application.

Applicants do note that Ballard claims priority to provisional application 60/273,190 (filing date of March 2001) and provisional application 60/316,773 (filing date August 2001). However, the filing date of provisional application '773 also post dates the filing date of the instant application and is therefore not prior art in regards to the instant application. As such, Applicants respectfully assert that Ballard is proper prior art only to the extent that that provisional application '190 supports the subject matter asserted to Ballard by the Office Action.

Provisional application '190 is concerned with the use of mouse-less data entry into a web-based application strictly through the use of a keyboard with tab-over options, hot keys, access keys and meta-data. Provisional application '190 does not concern itself with *utilizing the voice input for navigating to a search page* or with *inputting the client account information to complete at least one of the plurality of data fields comprises utilizing the voice input to navigate among the plurality of data fields.* Ballard is silent as to the use of any type of voice input. As such, Ballard is not prior art vis-à-vis the instant application because provisional application '190 fails to support the subject matter asserted to Ballard by the Office Action.

The Office Action essentially concedes that the combination of Pearson and Giangarra does not describe each and every claim element and relies on Ballard cure the deficiencies of Pearson and Giangarra discussed above. However, since Ballard is not prior art regarding the instant application, it is respectfully submitted that the combination of Pearson, Giangarra and Ballard fails to describe each and every claim element. As such, independent claim 1 is allowable over the combination of Pearson, Giangarra and Ballard for at least these reasons. Independent claims 7, 12, and 16 recite similar subject matter and are therefore allowable for at least these reasons. Since claims 2-3, 9-11, 17-18, and 20 depend from allowable independent claims 1, 7 or 16, these claims are also allowable for at least the same reasons. Accordingly, the rejection of claims 2-3, 7, 9-12, 16-18, and 20 should also be withdrawn.

Conclusion

In view of the foregoing amendments and remarks, this application is now in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is invited to call the Applicants' attorney at the number listed below.

No fees are believed due. However, please charge any additional fees or credit any overpayment to Deposit Account No. 50-3025.

Respectfully submitted,

Date: June 05, 2007

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